

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
<b>THIS DOCUMENT RELATES TO:  ALL WAVE 5 CASES AND THOSE ON ATTACHED EXHIBIT A</b>	

**PLAINTIFFS' MOTION TO EXCLUDE CERTAIN OPINIONS  
AND TESTIMONY OF RAGNVALD MJANGER, MD**

Plaintiffs respectfully request that the Court preclude defense expert Ragnvald Mjanger, M.D., from giving opinions on: (1) the adequacy of Defendants' product warnings and instructions for use ("IFU"), including opinions regarding what risks of the devices other doctors know of; (2) whether Defendants' transvaginal mesh products at issue are defectively or reasonably designed; (3) the degradation of polypropylene or its clinical significance; (4) his statements about the safety and efficacy of Defendants' products based on his own practice. The basis for Plaintiffs' motion is more fully set out in the accompanying Memorandum.

In support of this motion, Plaintiffs have submitted a memorandum of law and also rely upon the following attached exhibits:

- a) A true copy of Dr. Ragnvald Mjanger's Curriculum Vitae is attached hereto as Exhibit B.
- b) A true copy of Dr. Ragnvald Mjanger's General Report is attached hereto as Exhibit C.

c) A true copy of the General Deposition of Dr. Ragnvald Mjanger's dated July 20, 2017, is attached hereto as Exhibit D.

Dated: August 15, 2017

Respectfully submitted,

/s/Thomas P. Cartmell

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 15, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system in the individual case of Betty Linton McCumber v. Ethicon, Inc, et al., 2:12-cv-08083. I hereby certify that on August 17, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system in Ethicon MDL #2327, which sent notification of such filing to the CM/ECF participants registered to receive service in this MDL. I hereby certify that on August 18, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF participants registered to receive service in this MDL.

/s/Thomas P. Cartmell